B. REMARKS

The Examiner is thanked for the performance of a thorough search. No claims have been canceled or added in this reply. Hence, Claims 1-18 are pending in this application. The amendments to the claims do not add any new matter to this application. Furthermore, the amendments to the claims were made to improve the readability and clarity of the claims and not for any reason related to patentability. All issues raised in the Office Action mailed June 23, 2006 are addressed hereinafter.

REJECTION OF CLAIMS 1-18 UNDER 35 U.S.C. § 102(b)

Claims 1-18 are rejected under 35 U.S.C. § 102(b) as being anticipated by *Koller et al.*, U.S. Patent No. 6,009,542 (hereinafter "*Koller*"). It is respectfully submitted that Claims 1-18, as amended, are patentable over *Koller* for at least the reasons provided hereinafter.

CLAIM 1

Claim 1 is directed to a method for storing data in a nonvolatile memory that recites:

"a software application determining a desired location in the nonvolatile memory for storing a data block;
the software application inserting an address value in the data block, wherein the address value identifies the desired location;
prior to performing an operation that stores the data block to the nonvolatile memory, a module other than the software application verifying that the address value contained within the data block correctly identifies the location in the nonvolatile memory into which the operation is going to store the data block; and
performing the operation to store the data block to the nonvolatile memory only if the address value contained within the data block correctly identifies the desired location in the nonvolatile memory into which the operation is going to store the data block."

It is respectfully submitted that Claim 1 recites one or more limitations that are not taught or suggested by *Koller*. For example, it is respectfully submitted that at least the Claim 1 limitations "a software application determining a desired location in the nonvolatile memory for storing a data block" and "the software application inserting an address value in the data block, wherein the address value identifies the desired location" are not taught or suggested by *Koller*. These limitations recite that a software application performs the functions of determining the

desired location in the nonvolatile memory for storing the data block and inserting the address value into the data block. Having a software application insert the address value into the data block provides the benefit of allowing a verification to be performed at any level. For example, the verification may be performed at a host where the software application is executing, in between the host and a data storage unit, or at the data storage unit.

Koller describes an approach for preventing the transfer of data to corrupt addresses. The approach of *Koller* includes generating and inserting an identifier field 70 with a data field 65 in a data block 60 stored in a source buffer 55 of data buffer system 25. The value in identifier field 70 uniquely identifies the data block 60. The value in identifier field 70 is also correlated to the address of the destination block 85 stored on disk drive 20. Prior to transferring data from the source data block 60 to the destination data block 85, the expected value is determined and compared to the value in identifier field 70. A mismatch indicates an error in either the address of the source data block 60 or the destination data block 85 and the transfer is aborted.

One significant distinction between the approach recited in Claim 1 and the approach described in *Koller* is that in Claim 1, the software application determines the desired location in the nonvolatile memory for storing the data block and inserts the address value into the data block, while in *Koller*, the generation of the value for identifier field 70 occurs within data buffer system 25 of disk drive 20. *Koller* does not teach or suggest a software application generating the value for identifier field 70. This difference is significant because the approach of *Koller* can only be used to detect errors that occur within disk driver 20. Errors that occur "upstream" of disk drive 20 will not be detected. In view of the foregoing, it is respectfully submitted that at least the Claim 1 limitations "a software application determining a desired location in the nonvolatile memory for storing a data block" and "the software application inserting an address value in the data block, wherein the address value identifies the desired location" are not taught or suggested by *Koller* and that Claim 1 is therefore patentable over *Koller*.

CLAIMS 2-6

Claims 2-6 all depend from Claim 1 and include all of the limitations of Claim 1. It is therefore respectfully submitted that Claims 2-6 are patentable over *Koller* for at least the reasons set forth herein with respect to Claim 1. Furthermore, it is respectfully submitted that Claims 2-6 recite additional limitations that independently render them patentable over *Koller*.

CLAIMS 7-12

Claims 7-12 recite limitations similar to Claims 1-6, except in the context of computer-readable media. It is therefore respectfully requested that Claims 7-12 are patentable over *Koller* for at least the reasons set forth herein with respect to Claims 1-6.

CLAIMS 13-18

Claims 13-18 recite limitations similar to Claims 1-6, except in the context of computer-readable media. It is therefore respectfully requested that Claims 13-18 are patentable over *Koller* for at least the reasons set forth herein with respect to Claims 1-6.

In view of the foregoing, it is respectfully submitted that Claims 1-18 are patentable over *Koller*. Accordingly, reconsideration and withdrawal of the rejection of Claims 1-18 under 35 U.S.C. § 102(b) as being anticipated by *Koller* is respectfully requested.

CONCLUSION

It is respectfully submitted that all of the pending claims are in condition for allowance and the issuance of a notice of allowance is respectfully requested. If there are any additional charges, please charge them to Deposit Account No. 50-1302.

The Examiner is invited to contact the undersigned by telephone if the Examiner believes that such contact would be helpful in furthering the prosecution of this application.

Respectfully submitted,

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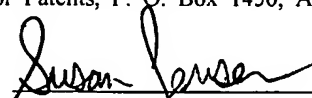
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